

PEEL: Police legitimacy 2015

An inspection of City of London Police



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Contents

Overview – How legitimate is the force at keeping people safe and reducing crime?	4
Overall judgment.....	4
Summary	4
Force in numbers	8
Introduction	10
Methodology	10
To what extent does practice and behaviour reinforce the wellbeing of staff and an ethical culture?	12
Introduction.....	12
How well does the force develop and maintain an ethical culture?.....	16
How well does the force provide for the wellbeing of staff?	17
How well has the Code of Ethics been used to inform policy and practice?	18
How fairly and consistently does the force deal with complaints and misconduct?	19
Summary of findings	23
How well does the force understand, engage with and treat fairly the people it serves to maintain and improve its legitimacy?	25
Introduction.....	25
How well does the force understand the people it serves and the benefits of engaging with them?.....	26
How well does the force engage with the all people it serves?	27
To what extent are people treated fairly and with respect when they come into contact with police officers and staff?	28
Summary of findings	30
To what extent are decisions taken on the use of stop and search and Taser fair and appropriate?	31

Introduction.....	31
To what extent does the force ensure that it complies with the Best Use of Stop and Search scheme?.....	31
To what extent does the force ensure that Tasers are used fairly and appropriately?.....	36
Summary of findings.....	40
Annex A – HMIC judgments	41
Annex B – Data methodology	42
Annex C – The Best Use of Stop and Search scheme	44
Annex D – Types of use of Taser	46

Overview – How legitimate is the force at keeping people safe and reducing crime?

Overall judgment¹



Good

Throughout 2015, HMIC's PEEL legitimacy inspection programme has assessed the culture within City of London Police, and how this is reflected in the force's public engagement, use of Taser and compliance with the Best Use of Stop and Search scheme.

City of London Police had effectively promoted the Code of Ethics² and incorporated the code into its policies and practice. These ethical principles were clearly understood by staff. The force has a good understanding of the people it serves. Officers use a range of effective approaches to identify public views, and use social media to engage with local residents and businesses.

HMIC found that City of London Police is not compliant with the Best Use of Stop and Search scheme.³ It does not publish all the required outcomes, and has an insufficient understanding of the impact of these powers on young people and black, Asian and minority ethnic (BAME) people. Although its use of Taser is generally fair and appropriate, the force does not appear to understand sufficiently the reasons for its apparent high use of Taser against black, Asian and minority ethnic people.

This is the first time HMIC has graded forces on their legitimacy, so no year-on-year comparison is possible.

Summary

HMIC found that City of London Police had effectively promoted the Code of Ethics and incorporated the code into its policies and practice. These ethical principles are clearly understood by staff.

¹ Outstanding, Good, Requires improvement or Inadequate – see Annex A.

² *Code of Ethics – A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, London, July 2014. Available from: www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf

³ *Best Use of Stop and Search Scheme*, Home Office, 2014. Available from: www.gov.uk/government/publications/best-use-of-stop-and-search-scheme

The force works well to promote the wellbeing of its staff. The service offered by the occupational health unit is comprehensive and staff who used the service spoke very highly of it. However, on occasions, there were delays in accessing the service.

In respect of complaints and misconduct cases, HMIC was pleased to see that the force had put in place some measures to improve consistency.

When HMIC looked at how well the force understands and successfully engages with all the people it serves, we found that the force has a good understanding of the people it serves. Officers use a range of effective approaches to identify public views, and social media is used by officers to engage with local residents and businesses.

Chief officers have set clear expectations about the behaviour expected of members of City of London Police, and officers and staff treat the public fairly and with respect.

Stop and search and Taser are two ways that the police can prevent crime and protect the public. However, they can be intrusive and forceful methods, and it is therefore vital the police use them fairly and appropriately. HMIC found that City of London Police is not compliant with the Best Use of Stop and Search scheme. The force does not publish all the required outcomes, and has an insufficient understanding of the impact of these powers on young people and black, Asian and minority ethnic people.

Although its use of Taser is generally fair and appropriate, the force does not appear to understand sufficiently the reasons for its apparent high use of Taser against black, Asian and minority ethnic people.

To what extent does practice and behaviour reinforce the wellbeing of staff and an ethical culture?



Good

HMIC found that City of London Police had effectively promoted the Code of Ethics and incorporated the code into its policies and practice. These ethical principles are clearly understood by staff.

The force conducted a staff survey in 2014 and was effectively dealing with concerns raised by staff. The force had made its promotion process more open and transparent, for example by including Police Federation and staff associations as observers on its promotion boards.

The force works well to promote the wellbeing of its staff. The service offered by the occupational health unit is comprehensive and staff who used the service

How well does the force understand, engage with and treat fairly the people it serves to maintain and improve its legitimacy?



Good

City of London Police has a good understanding of the people it serves. It has developed good profiles of local areas and it appropriately analyses public surveys. The force clearly understands the importance of engagement in building police legitimacy. We found a robust system to identify and resolve community tensions.

Officers use a range of effective approaches to identify public views. They use social media to engage with local residents and businesses. We found that officers and staff attend meetings and engage effectively with the public at a variety of events and venues. We consider that the force could do more to encourage public

To what extent are decisions taken on the use of stop and search and Taser fair and appropriate?



Requires improvement

City of London Police is not compliant with the Best Use of Stop and Search scheme. It does not publish all the required outcomes, and has an insufficient understanding of the impact of these powers on young people and black, Asian and minority ethnic people.

Independent scrutiny of its use of stop and search powers is not sufficiently developed. The force should improve its recording of reasonable grounds to search, along with the supervisory arrangements it has in place to assess whether it uses the power correctly.

Taser-trained officers understand how to apply the National Decision Model when considering whether to use Taser. However, while the force's

spoke very highly of it. However, on occasions, there were delays in accessing the service.

In respect of complaints and misconduct cases, HMIC was pleased to see that the force had put in place some measures to improve consistency, including a quarterly review of all cases by the professional standards department and the human resources department.

participation in policing.

Most officers and staff understand well the National Decision Model⁴ and use it to deal with high-profile events and incidents and to support ethical and effective daily decision-making.

Chief officers have set clear expectations about the behaviour expected of members of City of London Police, and most officers and staff consistently treat the public fairly and with respect.

use of Taser is generally fair and appropriate, the force does not appear to understand the reasons for its apparent high use of Taser against black, Asian and minority ethnic people.

⁴ *College of Policing – Authorised Professional Practice on National Decision Model*, College of Policing, December 2014. Available from: www.app.college.police.uk/app-content/national-decision-model/?s

Force in numbers



Ethnic diversity

Percentage of BAME in workforce 31 March 2015

overall workforce

12%

officers

6%

staff

23%

PCSOs

Percentage of BAME in local population, 2011 Census

21%



Gender diversity

Percentage of females in overall workforce 31 March 2015

35%

City of London
Police

41%

England and Wales
force average

Percentage of females by role, City of London Police

officers
22%

staff
58%

PCSOs

Percentage of females by role, England and Wales force average

officers
29%

staff
60%

PCSOs
47%



Public complaints

Number of allegations made by the public that have been finalised 12 months to 31 March 2015

City of London
Police

226

Proportion of finalised allegations investigated 12 months to 31 March 2015

City of London
Police

38%

England and Wales
force average

45%

Proportion of finalised allegations upheld after investigation 12 months to 31 March 2015

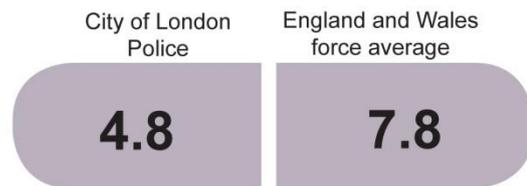


Stop and search

Number of stops and searches carried out 12 months to 31 March 2015



Stops and searches per 1,000 population 12 months to 31 March 2015



Change in number of stops and searches 12 months to 31 March 2014 to 12 months to 31 March 2015

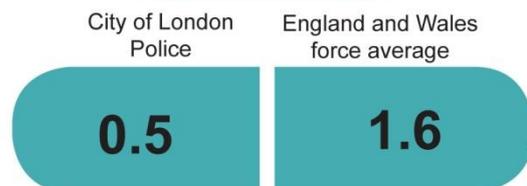


Tasers

Number of times a Taser was used 12 months to 31 December 2014



Number of times a Taser was used per 10,000 population 12 months to 31 December 2014



Tasers 'discharged' (as proportion of overall use) 12 months to 31 December 2014



Data: for further information about the data used in this graphic see annexes B and D in this report and annex B in the national legitimacy report.

* These data are based on small numbers and so comparisons with the average should be treated with caution.

** Data not included since the percentages are based on very small numbers.

Introduction

Throughout 2015, HMIC has assessed the extent to which police forces are legitimate in how they keep people safe and reduce crime. This is one strand of the PEEL (police effectiveness, efficiency and legitimacy) all-force inspection programme.

A police force is considered to be legitimate if it has the consent of the public, and if those working in the force consistently behave in a way that is fair, reasonable, effective and lawful. The force must also generate the trust and co-operation of the public.

To reach a judgment on each force's legitimacy, HMIC examined three areas:

Spring 2015 inspection

- To what extent does practice and behaviour reinforce the wellbeing of staff and an ethical culture?

Autumn 2015 inspection

- How well does the force understand, engage with and treat fairly the people it serves to maintain and improve its legitimacy?
- To what extent are decisions taken on the use of stop and search and Taser fair and appropriate?

This report provides the main findings for City of London Police.

Methodology

During our inspection we interviewed relevant senior leaders, collected data and documentation from forces, surveyed the public to seek their views of the force, held focus groups for those at different grades and ranks, and undertook unannounced visits to individual police stations to gather evidence and speak with officers and staff.

Prior to inspection fieldwork we also reviewed a small number of Taser deployment forms and stop and search forms; and listened to calls for service from members of the public.

This work was informed by research on the two principal characteristics of a legitimate organisation – organisational justice and procedural justice.

Organisational justice⁵

Every day, people respond to the actions and decisions made by their organisation that affect them or their work. Research shows that an individual's perceptions of these decisions (and the processes that led to them) as fair or unfair can influence their subsequent attitudes and behaviours.

In a policing context, staff who feel they are treated fairly and with respect by their force, are more likely to go on to treat the public with whom they come into contact fairly and with respect. This will increase the public's view that the police act legitimately.

Procedural justice

Research⁶ has shown that for the police to be considered legitimate in the eyes of the public, people need to believe that the police will treat them with respect, make fair decisions (and take the time to explain these decisions), and be friendly and approachable. It also indicates that the way officers behave is central to policing as it can encourage greater respect for the law and foster social responsibility.

There is also an economic benefit for a force which is seen as legitimate by the communities it serves. The more the public provides support to the police through information or intelligence, or becomes more active in policing activities (such as Neighbourhood Watch or other voluntary activity), the less the financial burden on police forces.

⁵ *It's a fair cop? Police legitimacy, public cooperation, and crime reduction*, Andy Myhill and Paul Quinton, National Policing Improvement Agency, London, 2011. Available from: http://whatworks.college.police.uk/Research/Documents/Fair_Cop_Briefing_Note.pdf

⁶ *Ibid.*

To what extent does practice and behaviour reinforce the wellbeing of staff and an ethical culture?

Introduction

As organisational justice has a direct relationship to procedural justice (we treat others as we are treated), it is critical that the culture inside police forces is an ethical one, where challenge and continual improvement are encouraged. It is also crucial that all officers and staff feel that they and others are treated fairly and consistently (for example, when an allegation is made against them by a member of the public or a colleague). Even if a system or process is fair, if people do not believe that it is, then organisational justice will not have been achieved.

Officers and staff who feel they are treated fairly and with respect by their force, are more likely to go on to treat the public with whom they come into contact fairly and with respect. This will increase the public's view that the police act legitimately.

In spring 2015,⁷ HMIC made an assessment of police force culture. The inspection asked:

1. How well does the force develop and maintain an ethical culture?
2. How well does the force provide for the wellbeing of staff?
3. How well has the Code of Ethics been used to inform policy and practice?
4. How fairly and consistently does the force deal with complaints and misconduct?

In addition, HMIC also considered the number of females and black, Asian and minority ethnic (BAME) people at different ranks and grades, to determine the extent to which the diversity of the force reflects that of the communities it serves.

Gender and black, Asian and minority ethnic (BAME) breakdown in City of London Police

A breakdown of the full-time equivalent (FTE) workforce⁸ in City of London Police as at 31 March 2015 is shown below.

⁷ The inspection took place between March and June 2015.

⁸ Workforce comprises officers, staff and police community support officers (PCSOs).

Figure 1: Breakdown of full-time equivalent (FTE) workforce in City of London Police, 31 March 2015

FTE	Total	Of which	
		Female	BAME*
Total workforce	1,156	402 (35%)	137 (12%)
Total officers	739	166 (22%)	46 (6%)
Constables	500	115 (23%)	33 (7%)
Sergeants	140	32 (23%)	9 (6%)
Inspecting ranks	79	16 (20%)**	4 (5%)**
Superintendents and above	20	3 **	0 **
Staff	406	235 (58%)	87 (23%)
PCSOs	11	1 **	4 **

Note that numbers may not add up to totals because of rounding.

* Individuals are not required to record their ethnicity. As a result, BAME totals and percentages exclude officers/staff/PCSOs where the ethnicity is not stated.

** Due to the figures being small, percentages should be treated with caution. In particular, percentages have not been included where totals are very small.

Source: Home Office Police Workforce statistics

The figure below shows how the percentages of female officers and staff in City of London Police compared with the averages of all forces in England and Wales. It shows they were lower for both officers and staff. Due to the numbers being small in City of London, HMIC did compare the percentage of female PCSOs with other forces.

Figure 2: The percentage of female officers and staff in City of London Police compared with the force average for England and Wales, 31 March 2015

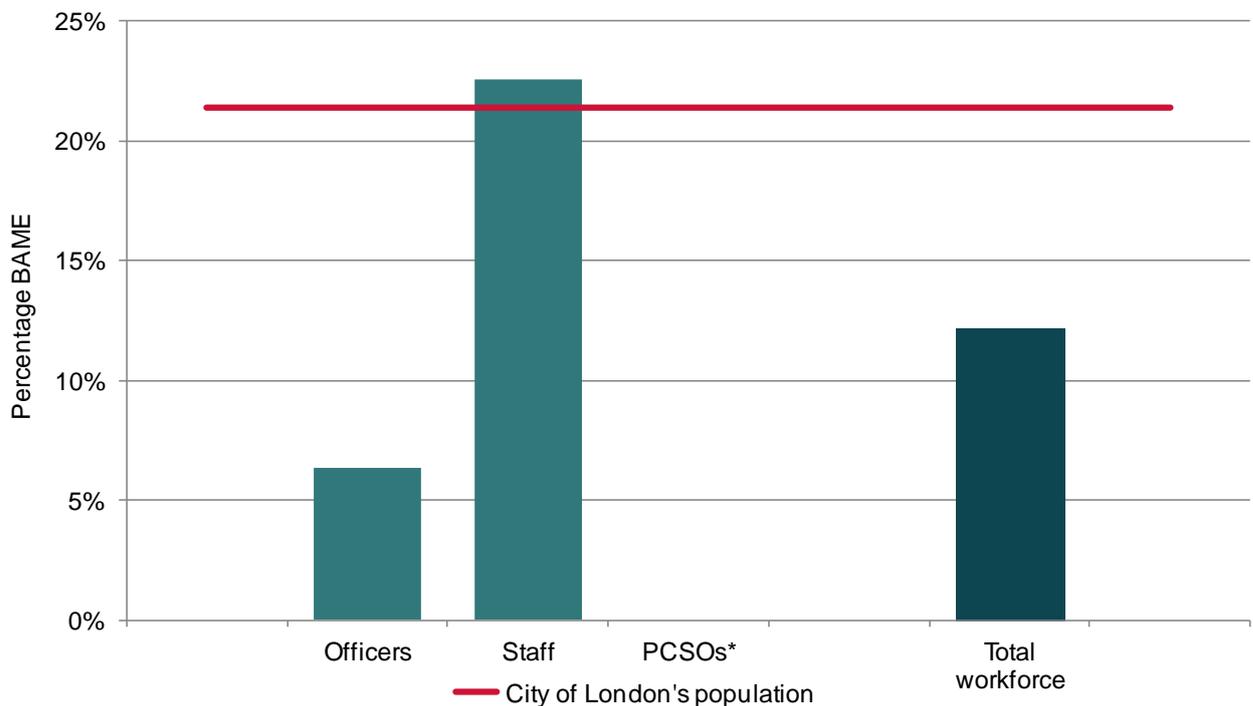


*Due to the figures being small, the chart showing the proportion of female PCSOs has been excluded.

Source: Home Office Police Workforce statistics

We compared the percentages of (i) BAME officers, (ii) BAME police staff and (iii) BAME PCSOs in each force with the proportion of BAME people living in the force area. In the City of London, around 21 percent of the local population were BAME. The figure below shows these comparisons. There was a statistically significant under-representation of BAME people in City of London Police's overall police workforce, as well as separately for officers.⁹ Please note that this analysis is based on the local resident population, however, the City of London has a large transient population which needs to be taken into consideration when drawing conclusions.

Figure 3: Percentage of BAME people within City of London Police's workforce (as at 31 March 2015) compared with its local resident population



***Due to the figures being small, the bar showing the proportion of BAME PCSOs has been excluded.**

Sources: Home Office Police Workforce statistics and Office for National Statistics 2011 Census

⁹ HMIC was unable to analyse to a statistically significant degree the ethnicity of PCSOs in City of London Police, due to the small number of PCSOs.

Police forces in England and Wales have experienced large reductions in their total workforce since the government's October 2010 spending review.¹⁰ HMIC also examined how the percentages of BAME officers and staff, and females within the workforce had changed over this period.

Across all police forces in England and Wales, total workforce numbers decreased by 15 percent between 31 March 2010 and 31 March 2015. However, the percentages of BAME people and females within the overall workforce increased during the five year period. Most notably, the proportion of female officers increased over 2 percentage points to 28 percent, and the proportion of BAME officers increased by nearly 1 percentage point to just under 6 percent. In contrast, the proportion of BAME PCSOs decreased by nearly 2 percentage points to just over 9 percent.

The figure below shows how these volumes and proportions have changed in City of London Police over the spending review period.

Figure 4: Change in City of London Police's workforce (overall volume and the percentage of female and BAME people), 31 March 2010 to 31 March 2015

	Total change		Percentage point change	
			% female	% BAME
Total workforce	-58	(-5%)	+5 ●	+2 ●
Officers	-113	(-13%)	+2	+1
Staff	+97	(+31%)	+3	+2
PCSOs	-42	(-79%)	**	**

Note that numbers may not add up to totals because of rounding.

● Denotes there has been a statistically significant change in the proportion (see Annex B for details).

** Due to workforce figures being small, percentage point change figures have been omitted.

Source: Home Office Police Workforce statistics

There was a statistically significant increase in the proportions of BAME people and females in City of London Police's overall workforce between 31 March 2010 and 31 March 2015. However, at an officer or staff level, there were no statistically significant changes in the percentages of BAME people or females. Numbers were too small at a PCSO level to identify such changes.

Overall, compared with other forces, as at 31 March 2015, the percentage of females within City of London Police's workforce was lower for both officers and staff. By ethnicity, there was an under-representation in BAME officers and there was no

¹⁰ Spending Review 2010, HM Government, October 2013. Available from:

www.gov.uk/government/publications/spending-review-2010

statistically significant change in this proportion between 31 March 2010 and 31 March 2015. The representation of BAME people had, however, increased for the overall workforce.

How well does the force develop and maintain an ethical culture?

It is critical that the culture inside police forces is an ethical one, where challenge and continual improvement are encouraged and where staff feel that they and others are treated fairly and consistently. If it is not, the service provided to the public may be equally unfair and inconsistent. HMIC therefore considered the extent to which people at all levels and all ranks (or equivalent) were creating and maintaining an ethical culture.

HMIC found that City of London Police was working well towards instilling an ethical culture. Following the launch of the Code of Ethics, the force had introduced online training for all staff. This was publicised on the force intranet and reinforced by the commissioner and senior leaders through personal messages and the 'Commissioner's Blog'. The force communications team also provided briefings to managers to support face-to-face meetings with staff about the code.

Staff told us that their managers were accessible and supportive and, as a result, they were comfortable raising any concerns they had about unethical behaviour. The force supported and encouraged whistleblowers, through advice on the intranet, a confidential phone line and confidential email address. However, the telephone line, 'Safecall', was not well-publicised and was rarely used.

The force primarily communicated its vision and values through its leadership development programme and 'City Futures' project. The force was reviewing existing policies and processes to ensure they focused on the core values of leading by example and empowerment. We were pleased to find that the force promotion process and the annual appraisal process required staff to provide evidence about how they acted in accordance with the force values. The force's counter corruption unit was effectively analysing trends and areas of risk in respect of ethical behaviour. Together these actions supported the development of an ethical culture.

Prior to its introduction of the Code of Ethics, the force was examining the issue of integrity within the workplace. It now produced and monitored data in areas such as mobile phone usage, and the acceptance of gifts and hospitality. Supervisors reviewed the data and, where appropriate, presented it to the Police Authority Professional Standards and Integrity Committee for review and oversight.

The force had conducted a staff survey in May 2014 and had been addressing concerns raised. Staff told us that the fairness and transparency of the promotion selection process had improved recently and we were pleased to find that the Police

Federation and staff associations now sat as observers on promotion interviews. Also, some promotion interview panels were all-female and some had external representation. However, some staff we spoke to felt that decisions about temporary promotions were not as transparent as they should be and were not always advertised. Staff were concerned that some officers and staff gained temporary promotion without undergoing a recognised and advertised selection process. Staff perceived this as unfair.

Overall HMIC found that City of London Police was effectively developing and maintaining an ethical culture.

How well does the force provide for the wellbeing of staff?

Police forces need to understand the benefits of having a healthier workforce – a happy and healthy workforce is likely to be a more productive one, as a result of people taking fewer sick days and having a greater investment in what they do. This inspection was concerned with what efforts were being made in forces to consider, and provide for, the wellbeing needs of their workforce.

We found that City of London Police provided a good range of services and support to staff to promote their wellbeing, including occupational health facilities, counselling, physiotherapy and staff development. The force also encouraged its managers to sit down with staff to review their wellbeing and offer guidance.

The majority of staff we spoke to were extremely positive about the services available to support their wellbeing. Many said that City of London Police was an excellent organisation to be part of and likened it to a family environment. Staff were generally very complimentary about their senior leaders.

Staff we spoke to mainly indicated that morale was good, although recent staff movements, as part of the service restructuring under the 'City Futures' project, saw staff being moved out of jobs in which they were settled, which was causing some concern.

We spoke to some police staff, predominantly police community support officers (PCSOs), who stated they felt they were viewed by some police officer colleagues as being less able, by virtue of having different powers. The force did not include PCSOs in the consultation process about the changes to the shift pattern, which added to this feeling. This had a negative impact on morale for some.

We found that staff were concerned about the age and state of repair of some of the force's buildings and associated poor working conditions. These concerns were predominantly linked to poor sanitation and health and safety issues. Senior leaders,

and the City of London Corporation,¹¹ which owns the force's buildings, intended to invest significantly in the police estate over the next three years, to provide a better working environment for staff. The first phase of the project was in progress. Reassuring staff of the imminent implementation of the plans is likely to reduce the feeling of being undervalued by those staff that have to work in poor conditions.

Occupational health services were provided by the City of London Corporation, which had resulted in some issues with service provision. The force had occupational health policies in place with services were provided following referral by managers. Staff we spoke to told us that access to services could be inconsistent and slow, in part because it was dependent on individual managers proactively initiating the process. However, the services provided were comprehensive, and staff who had used the services spoke very highly of them.

The force provided managers with comprehensive information to help them support staff. The professional standards department effectively shared information with managers to help them intervene before a problem arose, or got worse.

HMIC found that City of London Police was providing good support to improve the wellbeing of its staff.

How well has the Code of Ethics been used to inform policy and practice?

In April 2014, the College of Policing launched the Code of Ethics.¹² This sets out nine policing principles that should be applied by all officers and staff: Accountability; Integrity; Openness; Fairness; Leadership; Respect; Honesty; Objectivity; and Selflessness. These principles should be used to underpin the decisions and actions taken by officers and staff.

This inspection considered the extent to which officers and staff were aware of the Code of Ethics, and how the force was working to embed the code into policy and practice.

HMIC found that in City of London Police the Code of Ethics was a significant theme within the force's leadership development programme. The aim of the programme was to get staff to think differently and to give them the power to act, doing this ethically and appropriately.

¹¹ The City of London Corporation is the municipal governing body of the City of London local authority area. More information about the City of London Corporation is available from www.cityoflondon.gov.uk/Pages/default.aspx

¹² Code of Ethics – A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales, College of Policing, London, July 2014. Available from: www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf

We found that the force had incorporated appropriately the Code of Ethics in a number of standard operating procedures and policies, including the force's recent review and implementation of its unsatisfactory performance policy and acceptance of gifts and hospitality policy, which it reviewed following the launch of the Code of Ethics. The force had also applied the code to its procurement contracts with external contractors and suppliers.

The force had promoted and publicised the Code of Ethics through roadshows, intranet communications and training, and was explaining effectively its importance to new recruits during initial training and also to sergeants, as part of the force's leadership development programme.

We found that the Code of Ethics was well-publicised within the force and all staff had completed online training about the code. We were pleased to find evidence that the code was considered in many decision-making processes; including in the professional standards department. The staff members we spoke to had a good knowledge of the principles of the code.

Overall, HMIC found that the force was using the Code of Ethics appropriately to inform policy and practice.

How fairly and consistently does the force deal with complaints and misconduct?

Complaints made by the public against police officers, police staff, contracted police staff, and force procedures are recorded by individual police forces. Each complaint may have one or more allegations attached to it. For example, one complaint that an officer was rude and that they pushed an individual would be recorded as two separate allegations.

Each allegation can be dealt with, or resolved, in a number of ways. Some complaints, such as rudeness or incivility, may be dealt with through the local resolution process. The way these complaints are resolved should be adapted to the needs of the complainant – for example, they may involve an apology or an explanation of the circumstances in writing or in person. If the complaint is more serious, and assessed as not suitable for local resolution, it must be investigated by an appointed investigating officer who will produce a report detailing findings against each allegation. Under certain circumstances, some complaints do not proceed.

These use processes known as disapplication or dispensation (for example, if the matter is already the subject of a complaint or if the complaint is repetitious or vexatious), discontinuance (for example, if the complainant refuses to cooperate or it is not reasonably practicable to investigate the complaint) or if they are withdrawn by the complainant.¹³

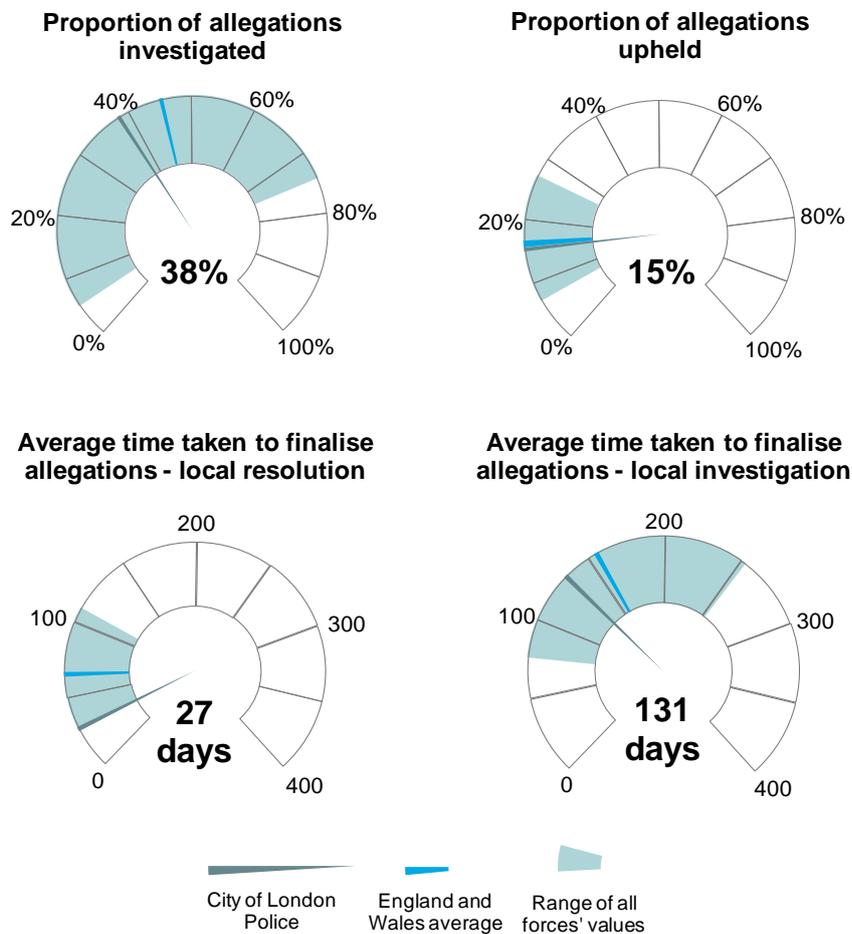
In the 12 months to 31 March 2015, City of London Police finalised 226 allegations from public complaints that were made against its officers and staff. Of these, 38 percent had been investigated and 55 percent had been locally resolved. A similar proportion of allegations were investigated and a greater proportion were locally resolved by City of London Police compared with the average of all forces.

In the 12 months to 31 March 2015, the average time City of London Police took to complete a local resolution was 27 days, less than the average of all forces of 64 days. Over the same period, the average time a local investigation took to complete was 131 days, less than the average of all forces of 154 days.

After local investigation, City of London Police closed 86 allegations in the 12 months to 31 March 2015. Of these, 15 percent were upheld, where it was concluded that the service provided by the police officer or police staff or the service as a whole did not reach the standard a reasonable person could expect. This was broadly in line with average of all forces of 16 percent. However, because of the low number of allegations locally investigated by City of London Police, comparisons with other forces should be treated with caution. The following figure shows how all of these values compare.

¹³ For a more complete outline of the definitions and potential outcomes resulting from public complaints, please see the Independent Police Complaints Commission's website: www.ipcc.gov.uk.

Figure 5: Proportion of allegations investigated, proportion upheld, time taken to finalise allegations by local resolutions and investigations by City of London Police, 12 months to 31 March 2015



Source: Independent Police Complaints Commission

Overall, in the 12 months to 31 March 2015, City of London Police finalised 38 percent of allegations by investigation. The proportion of allegations it upheld after local investigation was broadly in line with the average of all forces. Compared to the average of all forces, City of London Police took less time to complete both local resolutions and local investigations.

Are officers and staff, particularly those with protected characteristics, treated fairly following a complaint or allegation against them?

While it is very important that public complaints and allegations of misconduct or corruption are taken seriously, it is also important that those subject to these allegations or complaints are treated fairly and consistently, and that there is no bias or discrimination involved in any aspect of the decision-making process.

Building on the findings of HMIC's Police Integrity and Corruption inspection,¹⁴ this inspection considered if public complaints and misconduct investigations were dealt with in a timely and consistent manner. The inspection also considered whether investigations were conducted fairly and whether officers and staff, particularly those with protected characteristics,¹⁵ felt that they would be treated fairly following a complaint or allegation against them.

Before the fieldwork stage began, HMIC conducted a file review of 65 public complaints and internal misconduct allegations, to assess whether they had been considered fairly and consistently. We examined further the outcomes of the review during our fieldwork.

While not necessarily representative of all cases, in the small number of files we looked at we did not find any evidence of any bias in how complaints and internal misconduct allegations were dealt with, in respect of gender, ethnicity or rank.

HMIC found that in City of London Police, complaint and misconduct allegations involving police officers were dealt with by the professional standards department, whereas allegations involving police staff were the responsibility of the human resources department.

While the force tried to take a consistent approach when dealing with complaints and misconduct allegations, this could be challenging as police staff were subject to different terms and conditions. This had resulted in misconduct policies for officers and staff that varied and some outcomes for police staff had been more severe than those for police officers. However, HMIC was encouraged to find that the force had recognised this and had put in place some measures to improve consistency, including a quarterly review of all cases by the professional standards department and the human resources department.

¹⁴ *Integrity Matters – An inspection of arrangements to ensure integrity and to provide the capability to tackle corruption in policing*, HMIC, London, 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

¹⁵ Under the Equality Act 2010, it is against the law to discriminate against anyone because of: age; being or becoming a transsexual person; being married or in a civil partnership; being pregnant or having a child; disability; race including colour, nationality, ethnic or national origin; religion, belief or lack of religion/belief; sex; or sexual orientation. These are called 'protected characteristics'.

The force had no formal training in place for staff in its professional standards or human resources departments, which had the potential to lead to inconsistent practices and unfair treatment.

The City of London Police Committee's professional standards and integrity sub-committee¹⁶ reviewed all complaints and misconduct cases. The sub-committee was able to ask questions and challenge the force on individual cases. This supported fairness in the application of the complaints and misconduct processes.

HMIC was pleased to find that the force was collating lessons learned from investigations and taking appropriate action. However, it was often difficult to determine whether complainants and those complained about had been routinely kept up to date with the progress of the complaint.

The professional standards department dealt with the majority of complaint and misconduct investigations. We found that frontline managers tended to escalate cases to the professional standards department, rather than deal with them locally. The force intended to change this by ensuring that low-level complaints were dealt with by local managers, where appropriate. This will assist the professional standards department by giving managers the experience of managing suitable misconduct cases and reducing the number of inappropriate referrals of cases. The force also intended to ensure that its professional standards and human resources departments worked more closely to increase consistency, transparency and fairness in the handling of staff and officer cases.

Most officers and staff we spoke to generally felt that the force treated officers and staff fairly in respect of complaints and misconduct allegations.

Summary of findings



Good

HMIC found that City of London Police had effectively promoted the Code of Ethics and incorporated the code into its policies and practice. These ethical principles are clearly understood by staff.

The force conducted a staff survey in 2014 and was effectively dealing with concerns raised by staff. The force had made its promotion process more open and transparent, for example by including Police Federation and staff associations as observers on its promotion boards.

¹⁶ The Court of Common Council is the police authority for the City of London police area as set out in section 101(1) of the Police Act 1996, available from:

www.legislation.gov.uk/ukpga/1996/16/section/101

The force works well to promote the wellbeing of its staff. The service offered by the occupational health unit is comprehensive and staff who used the service spoke very highly of it. However, on occasions, there were delays in accessing the service.

In respect of complaints and misconduct cases, HMIC was pleased to see that the force had put in place some measures to improve consistency, including a quarterly review of all cases by the professional standards department and the human resources department.

How well does the force understand, engage with and treat fairly the people it serves to maintain and improve its legitimacy?

Introduction

The negative effect of poor police and community relations on public perceptions should not be underestimated. People who already have a poor opinion of the police are more likely to perceive their contact with the police as a negative experience. On the other hand, perceptions of fair decision-making and positive public interaction and engagement can improve perceptions and increase trust, leading to improved or enhanced police legitimacy. This, in turn, helps efforts to reduce crime by encouraging greater respect for the law and fostering social responsibility, by making people more likely to help the police and not break the law.

Community engagement should influence every aspect of policing. For engagement to be effective, the organisation should focus on the needs of citizens and be committed to ensuring that the results from engagement work are integrated into service design and provision, and that communities participate in that provision.

In autumn 2015, HMIC made an assessment of the extent to which police forces understand and engage with the people they are there to serve. Based on the College of Policing's Authorised Professional Practice on Engagement and Communication,¹⁷ the inspection asked:

1. How well does the force understand the people it serves and the benefits of engaging with them?
2. How well does the force engage with all the people it serves?
3. To what extent are people treated fairly and with respect when they come into contact with police officers and staff?

¹⁷ Authorised Professional Practice on Engagement and Communication, College of Policing, 2015. Available from: www.app.college.police.uk/app-content/engagement-and-communication/?s

How well does the force understand the people it serves and the benefits of engaging with them?

HMIC's inspection considered the extent to which forces understand the relationship between positive public engagement and increased public confidence in the police. We also assessed the extent to which, at local and force levels, the force understands the needs and concerns of the people it serves.

HMIC found that City of London Police works very closely with businesses, residents and visitors. The force achieves this through a variety of well-established working arrangements and local partnerships. We found that the officers and staff whom we spoke to consistently understand the relationship between constructive engagement work with the people the force serves and police legitimacy.

We also found evidence of extensive engagement, consultation and work between the force and the City of London Corporation, international banking businesses, licensing, retail and local residents. The force demonstrated that it has a comprehensive understanding of the different communities and people within the City of London. This understanding guides the force's policing, which can help build public confidence in the police.

The force makes good use of surveys, meetings and face-to-face contact to better understand the needs, concerns and expectations of the people it serves. The force explained in detail the unique nature of the policing environment, and the challenges with engaging with local residents, visitors and businesses. The force's approach has enabled it to understand well the people it serves.

The force has mapped the contrasting elements within the residential community in the City of London. These elements exemplify the diverse policing requirements posed by a small geographical area which includes both extremely wealthy and very much less prosperous parts. The force's understanding of, and cooperation with these diverse communities, helps to explain the good levels of public satisfaction apparent in surveys and the robust partnerships that we found.

Officers in the force mainly demonstrate sensitivity and an ability to identify and manage tensions. This was evident in the force's good use of community impact assessments, which are used following incidents where confidence in the police might be compromised. HMIC was provided with copies of these documents. These assessments effectively direct policing activity, particularly in relation to reassurance, and also support good communication with interested parties in the event of incidents or events that cause inconvenience or disruption to the City of London.

The force also makes use of neighbourhood profiles, which include a rich mix of information about the area, and is currently compiling a fresh set of profiles, following its restructure of the safer neighbourhood team.

HMIC is satisfied that City of London Police understands the benefits for police legitimacy that can be gained by engaging positively with its communities.

How well does the force engage with the all people it serves?

For the police to find the most cost effective and efficient ways of communicating with the public, they should tailor their methods of engagement in a way that meets the needs and preferences of those they serve. The police should ensure they overcome any barriers to successful engagement (for example, social exclusion, location, low confidence in the police) to seek the views of all the people they serve and keep them informed.

In City of London Police, HMIC found numerous instances of effective consultation and community engagement. We found effective engagement work between the force and relevant communities before, during and after events such as the Lord Mayor's Show and on occasions when marches and protests take place, involving businesses, residents, the City of London Corporation and protesters. We noted that a community impact assessment guided policing activity during an 'Occupy' protest around St Paul's Cathedral and that a high court judge subsequently commended the force for its impartial approach. This commitment to acting fairly bolsters police legitimacy in City of London.

The force uses a range of methods to engage with its communities, including meetings and drop in sessions. It is also using social media and encourages officers to do so, as shown by the Twitter accounts used by a range of officers. The force also uses IMODUS (cross-sector community conferencing) to reach people across London.

The force uses electronic messaging extensively before, during and after major events and incidents to provide identified groups with information about developing situations. Importantly, the force also uses these systems when debriefing operations to seek feedback and identify learning for the future.

The force has forged constructive links with local London newspapers and promotes its success stories. The force's corporate communications team also monitors the media, and briefs senior officers on emerging local and national media stories that may affect policing in the City of London. This helps guide City of London police activity that can build public confidence in policing.

The force has established effective methods of reaching groups and minorities within the City of London with specific needs. For example, the force has deployed into the Bangladeshi community, in the east of the City of London, two officers with similar Bangladeshi cultural backgrounds. The force also conducts leaflet campaigns in a variety of languages as required.

The force licensing officer is also able to work with lesbian, gay, bi-sexual and transgender people via a local transgender nightclub which holds events across the City of London.

We were also made aware of the force's ability to engage more closely with less-influential and, to a certain extent, invisible communities such as those comprising the many people who work during the night cleaning and servicing office blocks.

We also found that the force is encouraging a certain amount of input from volunteers. For instance, we were told that the force has 19 volunteers assisting in roles such as stablehands in the mounted unit, a recent volunteer from the private banking sector is currently providing the police with specialist crime prevention advice, and the force also has volunteer cadets. We consider that the force has scope to increase public participation in policing, which can build confidence in police and provide useful support to the force.

Overall, HMIC is satisfied that City of London Police is engaging well with the people it serves.

To what extent are people treated fairly and with respect when they come into contact with police officers and staff?

Public bodies (including the police) are required to consider all individuals when carrying out their work, and understand how different people will be affected by their activities. The duty requires the police to show evidence of this in their decision-making.

This inspection looked at whether all members of the public (including those with protected characteristics) are treated (and perceive that they are treated) fairly and with respect by the police. We also assessed the extent to which officers understand the National Decision Model,¹⁸ the framework by which all policing decisions should be made, examined and challenged. The Code of Ethics is a central component of the National Decision Model.

The police have thousands of interactions with the public on a daily basis. Research indicates that the quality of the treatment received during encounters with the police is more important to individuals than the objective outcome of the interaction. Before we began our fieldwork activity, we listened to around 40 calls made from members of the public to the 101 (non-emergency) and 999 (emergency) numbers to assess the quality of the treatment received. To determine the overall quality of the call, we considered criteria such as whether the call-handler remained polite, professional

¹⁸ *College of Policing – Authorised Professional Practice on National Decision Model*, College of Policing, December 2014. Available from: www.app.college.police.uk/app-content/national-decision-model/?s

and respectful throughout the call, whether he or she took the caller's concerns seriously, appropriately assessing the risk and urgency of the call, and how well he or she established the caller's needs, managed the caller's expectations and explained what would happen next.

Although not necessarily representative of all calls responded to by City of London Police, from the 40 calls assessed, HMIC was generally satisfied that the call-handlers were polite and respectful.

Some callers rang to be updated about fraud cases that they had reported. They were frustrated as they were only given information by email and were unable to speak to an individual about their case.

In City of London Police, HMIC found that officers understand well and use widely the National Decision Model to support decision-making for high-profile events, such as large scale public order policing, but also to support good routine operational decision-making, such as when to carry out a stop and search.

The National Decision Model forms an integral part of the force's personal safety training, which it provides to all officers and operational staff twice a year. It is also a major theme in other training, such as that provided to new officers, special constables, detectives and staff who work in custody suites.

We asked staff at many levels within the force about their understanding of the model. Reassuringly, all had heard of it and many displayed a sound understanding of its elements. Those who could not describe the detail clearly still understood the principles of its use and could apply the model in a variety of circumstances.

The force monitors complaints, to ensure that it is treating the public with fairness and respect.

During our inspection, staff told us that the force had not provided them with specific training on how to treat the public in a respectful and courteous manner but that it was a general expectation and a source of pride. They also indicated that if they were to witness a colleague's behaviour that fell short of the required standard, they would not tolerate it and would either address it by personally challenging the colleague or by a more formal report.

HMIC is satisfied that most officers in City of London Police treat the public fairly and with respect.

Summary of findings



Good

City of London Police has a good understanding of the people it serves. It has developed good profiles of local areas and it appropriately analyses public surveys. The force clearly understands the importance of engagement in building police legitimacy. We found a robust system to identify and resolve community tensions.

Officers use a range of effective approaches to identify public views. They use social media to engage with local residents and businesses. We found that officers and staff attend meetings and engage effectively with the public at a variety of events and venues. We consider that the force could do more to encourage public participation in policing.

Most officers and staff understand well the National Decision Model¹⁹ and use it to deal with high-profile events and incidents and to support ethical and effective daily decision-making.

Chief officers have set clear expectations about the behaviour expected of members of City of London Police, and most officers and staff consistently treat the public fairly and with respect.

¹⁹ *College of Policing – Authorised Professional Practice on National Decision Model*, College of Policing, December 2014. Available from: www.app.college.police.uk/app-content/national-decision-model/?s

To what extent are decisions taken on the use of stop and search and Taser fair and appropriate?

Introduction

Fairness, and the perception of fairness, is crucial to police legitimacy. It is therefore important that fairness is demonstrated in all aspects of policing, including the use of police powers. Some of the most intrusive powers available to the police are those involving stopping and searching people and the use of Taser.²⁰

In autumn 2015, HMIC assessed the use of Taser and stop and search powers (specifically, compliance with the Best Use of Stop and Search scheme²¹ and how well reasonable grounds were recorded) to determine whether officers were using their powers fairly and in accordance with legal requirements and Authorised Professional Practice.

The inspection asked:

1. To what extent does the force ensure that it complies with the Best Use of Stop and Search scheme?
2. To what extent does the force ensure that Tasers are used fairly and appropriately?

To what extent does the force ensure that it complies with the Best Use of Stop and Search scheme?

Background

The primary role of the police is to uphold the law and maintain the peace. Unfair, unlawful or unnecessary use of stop and search powers make this task harder, with one of the direct consequences being a reduction in public trust and police legitimacy, and people being more likely to break the law and less willing to co-operate with the police. The purpose of stop and search powers are to enable officers to dismiss or confirm suspicions about individuals carrying unlawful items without exercising their power of arrest. The officer must have reasonable grounds for carrying out a search.

²⁰ *College of Policing: Authorised Professional Practice on armed policing – legal framework and Taser*. Available from: www.app.college.police.uk/app-content/armed-policing/conducted-energy-devices-taser/

²¹ *Best Use of Stop and Search Scheme*, Home Office, 2014. Available from: www.gov.uk/government/publications/best-use-of-stop-and-search-scheme

In our 2013 inspection on stop and search,²² HMIC concluded that few forces could demonstrate that use of stop and search powers was based on an understanding of what works best to cut crime and rarely was it targeted at priority crimes in their areas. Forces had reduced the amount of data collected, to reduce bureaucracy, but this had diminished their capability to understand the impact of the use of stop and search powers on crime levels and community confidence.

The report was clear that, for a stop and search encounter to be effective and lawful, a police officer must have reasonable grounds for suspicion (based on specific and objective information) that a person is in possession of a stolen or prohibited item. Those grounds should be fully explained to the person being stopped and searched, and the person should be treated with fairness, courtesy and respect. In such circumstances, finding the item and arresting the offender or, alternatively, eliminating the suspicion and avoiding an unnecessary arrest are both valid and successful outcomes.

Following HMIC's 2013 inspection, on 26 August 2014 the Home Office published guidance to police forces on implementing the Best Use of Stop and Search scheme.

The principal aims of the scheme are for the police to establish greater transparency and community involvement in the use of stop and search powers and make sure that the powers are used in an intelligence-led way to achieve better outcomes for the public.

All police forces in England and Wales have signed up to the Home Office's Best Use of Stop and Search scheme. This inspection considered the extent to which forces are complying with the scheme.

Use of stop and search in City of London Police – Stop and search by volume

In the 12 months to 31 March 2015, City of London Police carried out 1,875 stops and searches. The table below shows this number per 1,000 population²³ for City of London Police and the average of all forces in England and Wales, as well as the change from the 12 months to 31 March 2014.

²² *Stop and Search Powers – are the police using them effectively and fairly?*, HMIC, July 2013. Available from: www.justiceinspectorates.gov.uk/hmic/media/stop-and-search-powers-20130709.pdf

²³ Here, an estimate of the transient population is used to aid comparison with other forces.

Figure 6: Number of stops and searches per 1,000 population carried out by City of London Police compared to the England and Wales average, 12 months to 31 March 2015, and the percentage change from the 12 months to 31 March 2014

	Stops and searches per 1,000	Change from previous year
City of London Police	4.8	-30%
England and Wales forces' average	7.8	-36%

Sources: Home Office Stop and Search data, Police Powers and Procedures 2014/15 and the Office for National Statistics Business Register and Employment Survey

Use of stop and search in City of London Police – Stop and search by ethnicity

Caution needs to be taken before drawing assumptions from these data, especially where they might appear to suggest that forces are unfairly targeting particular ethnicities in their use of stop and search powers. Although that is one possible explanation, there are a number of other factors which could result in any disparity, including:

- the 2011 ethnicity figures no longer being representative of the force's local population;
- the difference between the ethnicity of the street population available to be stopped and searched at any given time with the general force population;
- stops and searches being carried out on people who are not resident in the area (and so are not counted as part of the population);
- disparity in the crime rates between different ethnicities;
- disparity in the number of repeat stops and searches carried out on individuals by ethnicity; or
- difficulties with the recorded data by ethnicity (while forces always record ethnicity when arresting a person as a result of being stopped and searched, they do not always record it when the encounter does not involve an arrest).

It is important that forces understand their data along with reasons for any apparent disparity to ensure that their use of the powers is fair.

In particular, comparisons with the ethnicity of the resident population and the ethnicity of those stopped and search are potentially misleading because of the City of London's large transient population.

Recording reasonable grounds for suspicion

In our 2013 inspection, we were concerned to see that, of the 8,783 stop and search records we examined across all forces in England and Wales, 27 percent did not include sufficient reasonable grounds to justify the lawful use of the power.

For City of London Police, the 2013 inspection showed that 36 of 200 records reviewed (18 percent) did not have sufficient reasonable grounds recorded.

For this inspection we reviewed 100 stop and search records provided by the force. As in the 2013 inspection, we reviewed the records to determine if reasonable grounds were recorded. All of the records we reviewed had been endorsed by a supervisor. We found that 15 of the 100 records did not have reasonable grounds recorded.

This suggests that some officers, and some supervisors given the task of reviewing records, do not understand fully what constitutes reasonable grounds.

While the forms we reviewed may not be representative of all stop and search records completed by the force, the result indicates that still too many records do not have reasonable grounds recorded.

The item searched for had been found in 22 of the 100 records we reviewed.

Compliance with the Best Use of Stop and Search scheme

There are several aspects to the Best Use of Stop and Search scheme. As part of this inspection, HMIC considered the extent to which the force complied with each aspect of the scheme.

HMIC found that City of London Police is not compliant with the Best Use of Stop and Search scheme. Our analysis is set out in the table below.

While not a specific requirement of the scheme, we found that officers do not explicitly refer to the National Decision Model when making decisions about stop and search. However, when we spoke to them it was clear that they do routinely apply the principles of the model on a more intuitive basis. Some officers also told us that they seldom use stop and search powers and indicated that they would welcome further training.

Project Servator is an initiative that City of London Police launched, but is now being used in other parts of the country. It uses specially-trained officers to detect and deter those who visit areas while preparing to commit crimes. Such criminals may operate at a low level or may be intent on committing serious crimes, including acts of terrorism, against the City of London and its people. Stop and search encounters conducted under Project Servator now account for 26 percent of all the force's stops and searches. We were told that 70 percent of stop and search encounters carried out as part of Project Servator lead to an arrest.

The force publishes a wide range of useful and accessible information about stop and search powers on its website. It also plans to improve the efficiency of recording stop and search by introducing mobile data devices, which it will provide to operational officers.

We spoke with a wide range of officers during our inspection and found that knowledge of the Best Use of Stop and Search scheme is mixed. Although officers had generally heard of the scheme, some did not understand it in detail.

Feature of the Best Use of Stop and Search scheme	HMIC assessment of compliance
Recording and publishing the outcomes following a stop and search	<p>The force does not comply with this feature of the scheme.</p> <p>While City of London Police records and publishes a range of outcomes, it does not record if a caution or khat warning is given, and therefore does not comply with the scheme. However, the force does record and publish a description of items found and whether or not the outcome links to the initial grounds for the search. While the police.uk website publishes stop and search outcome data for City of London Police, the force does not publish data in respect of the full range of outcomes required by the scheme.</p>
Providing opportunities for the public to observe officers using the power	<p>The force complies with this feature of the scheme.</p> <p>The force encourages members of the public to observe stop and search. Officers told us that such observation has been taking place. However, we were unable to establish, of those people who have participated in these observations, how many have seen a stop and search.</p>
Explaining to communities how the powers are being used following a “community complaint”	<p>The force complies with this feature of the scheme.</p> <p>City of London Police has introduced a complaints ‘trigger’ so that every complaint arising from a stop and search encounter is referred to an external stop and search scrutiny group for review. Each complaint also triggers a review by the professional standards department.</p>

<p>Reducing the number of people stopped and searched without suspicion under Section 60²⁴ of the Criminal Justice and Public Order Act 1994</p>	<p>The force complies with this feature of the scheme.</p> <p>City of London Police has not issued a section 60 authorisation for stop and search since the scheme was introduced. However, the force has amended policy and practice to ensure that it complies with the scheme.</p>
<p>Monitoring the impact of stop and search – particularly on young people and black, Asian and minority ethnic groups</p>	<p>The force does not comply with this feature of the scheme.</p> <p>The force monitors the number of stops and searches by age and ethnicity but understanding of the impact of such searches is limited. The force has given some consideration to the disproportionate number of stop and search involving black, Asian and minority ethnic people. Senior officers believe that it may be attributable to the number of people who visit the city for the purposes of work or to visit the many night-time entertainment and licensed premises in the City of London. The force would benefit from further analysis of this issue. The force has not carefully considered what the impact of these powers might be on young people and should consider qualitative work with young people to address this gap.</p>

To what extent does the force ensure that Tasers are used fairly and appropriately?

Background

Taser is a device designed to temporarily incapacitate a person through use of an electrical current which temporarily interferes with the body's neuromuscular system. This usually causes the person to freeze or fall over; giving officers time to restrain them.

It projects a pair of barbs or darts attached to insulated wires which attach to the subject's skin or clothing. The device has a maximum range of 21 feet and delivers its electrical charge in a five-second cycle which can be stopped, extended or repeated.

²⁴ 'No suspicion' searches are provided for under section 60 of the Criminal Justice and Public Order Act 1994. Available from: www.legislation.gov.uk/ukpga/1994/33/section/60

Taser is one of a number of tactical options available to police officers when dealing with an incident where there is the potential for harm – to potential victims and/or the public, the police officers themselves, or the subject.

The way a Taser is used by police officers is categorised into a range of escalating actions from drawing the device, through to it being 'discharged' (that is, fired, drive-stunned or angled drive-stunned). A table in Annex D outlines the definitions of the different levels of use.

When police are required to use force to achieve a lawful objective, such as making a lawful arrest, acting in self-defence or protecting others, that force must be reasonable in the circumstances. If it is not, the officer is open to criminal or misconduct proceedings. It may also constitute a violation of the human rights of the person against whom the force was used.

HMIC has not previously inspected how Taser is used either in, or between, forces. This inspection considered whether chief officers understand how Taser is being used across the force area, to satisfy themselves that it is being used fairly and appropriately, and whether Taser-trained officers are acting in accordance with the College of Policing's Authorised Professional Practice and the legal framework each time it is used.²⁵

Use of Taser in City of London Police

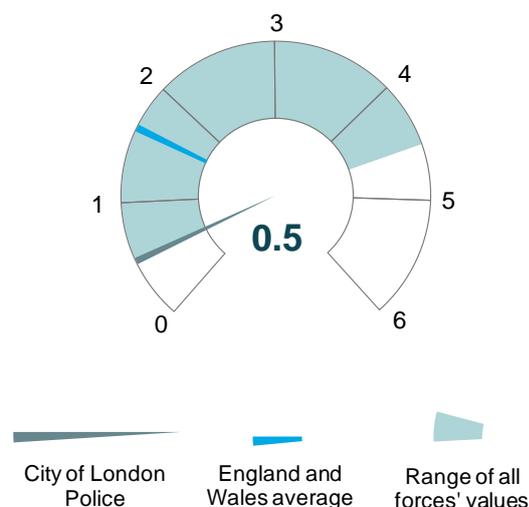
Every time a Taser is used in some capacity (this includes a full range of use from being drawn to being 'discharged') a police officer makes a record of its 'highest use' on a Taser deployment form.

Between 1 January and 31 December 2014, Taser was used in some capacity 20 times by City of London Police, representing 0.5 times for every 10,000 people²⁶ in the force's area. This was less than the average of all forces, which was 1.6 times per 10,000 population. In the same period the force 'discharged' Taser once.

²⁵ *College of Policing: Authorised Professional Practice on armed policing – legal framework and Taser*. Available from: www.app.college.police.uk/app-content/armed-policing/conducted-energy-devices-taser/

²⁶ Here, an estimate of the transient population is used to aid comparison with other forces.

Figure 7: Use of Taser per 10,000 population by City of London Police, 12 months to 31 December 2014



Sources: Home Office Police use of Taser statistics and the Office for National Statistics Business Register and Employment Survey

The Taser deployment form is a national document for gathering research information about the operational effectiveness of the Taser device, and any medical implications of its use. If officers fire the Taser, or if they use it in drive-stun or angled drive-stun mode, they are required to complete the full form, including a detailed description of the incident from commencement to resolution. The National Decision Model is used on the form as a structure for officers to record this description. For any other use, such as 'drawn', 'aimed', 'red-dotted' or 'arced', officers are only required to provide brief details of the incident. A detailed description, structured around the National Decision Model, is not required.

Before the fieldwork stage of the inspection, HMIC conducted a review of 20 Taser deployment forms provided by City of London Police. The forms showed that Taser had been fired twice, red-dotted 11 times, aimed once, and drawn six times.

Overall officers used Taser to protect themselves or others from a range of weapons, including several knives, a machete, metal bars and bottles.

On both occasions that the Taser was fired we found evidence that consideration of other tactics had been comprehensively recorded.

The 'brief details' and the NDM sections of the forms provided us with evidence to suggest that the use of Taser was lawful and appropriate in 18 of the 20 cases reviewed. In two cases there was insufficient information for us to make an assessment, as some information that should have been recorded was missing.

Where officers had been required to complete the NDM section of the form, none of them contained any mention of the national Code of Ethics for the police service

which is at the heart of the National Decision Model and should be considered at each stage, particularly under the 'Powers and Policy' section. This appears to be a national issue and is considered in our national Legitimacy report.

We found that Taser-trained officers in City of London Police understand how to apply the National Decision Model when considering whether to use Taser. Officers who carry Taser receive detailed initial training on the model and need to demonstrate a full understanding at regular subsequent training. The training includes effective exercises involving dealing with young, elderly and distressed people or those with mental health issues. Officers routinely make structured and clear decisions about the use of Taser.

The force has a clear rationale for the number of its Taser-trained officers, who should be trained and how it will deploy them. The force reviews this regularly, and recently chief officers have decided to increase the coverage of Taser to meet identified risks. The implementation of this decision is being preceded by community consultation, and the force is working in partnership with the University of Cambridge, which is to provide independent evaluation and scrutiny of the impact of this increase in Taser coverage.

The force complies with national standards for Taser training and officer selection. Taser-equipped officers are consistently supported by Taser-trained supervisors. This helps ensure fair and appropriate use of Taser.

The force has oversight of every incident where a Taser is used. A local supervisor and then the chief firearms instructor check each incident. The reporting form is then submitted to the professional standards department to identify any trends or patterns in use. This scrutiny helps ensure proportionate use of Taser.

The use of Taser against black, Asian and minority ethnic (BAME) people appears to be higher than against white people. We found no convincing explanation for this. We also found no independent scrutiny of the force's use of Taser. We would have expected more involvement in this from the Independent Advisory Group; greater scrutiny would support fair and effective use of Taser by City of London Police.

We spoke to other operational officers and staff who have little understanding of Taser tactics or how they could best assist at the scene of a Taser deployment. The force should include more training about Taser in personal safety training, to enhance the protection of the public and police.

We were disappointed to find that the force does not provide the public with information about the use of Taser.

Based on our assessment of the Taser forms and our fieldwork findings, HMIC is satisfied that Taser was appropriately used in 18 of the 20 cases considered. However, City of London Police has more to do to explain its apparent high use of Taser against BAME people.

Summary of findings



Requires improvement

City of London Police is not compliant with the Best Use of Stop and Search scheme. It does not publish all the required outcomes, and has an insufficient understanding of the impact of these powers on young people and black, Asian and minority ethnic people.

Independent scrutiny of its use of stop and search powers is not sufficiently developed. The force should improve its recording of reasonable grounds to search, along with the supervisory arrangements it has in place to assess whether it uses the power correctly.

Taser-trained officers understand how to apply the National Decision Model when considering whether to use Taser. However, while the force's use of Taser is generally fair and appropriate, the force does not appear to understand the reasons for its apparent high use of Taser against black, Asian and minority ethnic people.

Areas for improvement

- The force should ensure that its stop and search records include sufficient reasonable grounds to justify the lawful use of the power, and that officers understand fully the grounds required to stop and search.
- The force should ensure that adequate supervision takes place to ensure that its stop and search records are accurate and contain the required information in respect of reasonable grounds.
- The force should comply with the Best Use of Stop and Search scheme in relation to recording and publishing outcomes; and monitoring the impact of stop and search on young people and black, Asian and minority ethnic groups.
- As chief officers have decided to increase the coverage of Taser to meet identified risks, HMIC considers that force-wide oversight and scrutiny of its use should be introduced. Specifically, the force must be able to demonstrate whether it is used fairly and appropriately on people with protected characteristics.
- It was clear that non-Taser-trained officers have little understanding of Taser tactics or how they could best assist at the scene of a Taser deployment. More training about Taser should be included in personal safety training, to enhance the protection of public and police.

Annex A – HMIC judgments

The categories are:

- outstanding;
- good;
- requires improvement; and
- inadequate.

Judgment is made against how legitimate the force is at keeping people safe and reducing crime, it is not an assessment of the overall legitimacy of policing. In applying the categories HMIC considers whether:

- the legitimacy of the force is achieving is good, or exceeds this standard sufficiently to be judged as outstanding;
- the legitimacy of the force requires improvement, and/or there are some weaknesses; or
- the legitimacy of the force is inadequate because it is considerably lower than is expected.

Annex B – Data methodology

Please note the following for the data.

- The sources of the data are provided in each section. For the force in numbers data, please see the relevant section.
- Workforce figures (based on full-time equivalents) were obtained from the Home Office annual data return 502. Most of these are available from the Home Office's published *Police workforce England and Wales statistics*, although figures may have been updated since the publication.
- Police staff includes section 38 designated officers (investigation, detention and escort).
- Data from the Office for National Statistics 2011 Census were used for the number and proportion of BAME people within each force area. While the numbers may have since changed, more recent figures are based only on estimates from surveys or projections.
- For the City of London's overall population figures an estimate of the transient population, rather than the residential population, is used to aid comparability with other forces.
- HMIC has been made aware of updates from particular forces on their Taser and stop and search data. However, for fairness and consistency, we have presented the data as published by the relevant sources.

Please note the following for the methodology applied to the data.

- Comparisons with most similar group of forces – In most cases, comparisons are made with the average of all forces in England and Wales. Please note that this is the simple average of all forces' values, not the England and Wales figure. This is to ensure that larger forces do not have a disproportionate effect on the average.
- Comparisons with averages – For some data sets, we state whether the force's value is 'below', 'above' or 'broadly in line with' the average. To calculate this, the difference to the mean average, as a proportion, is calculated for all forces. After standardising this distribution, forces that are more than half a standard deviation from the mean average are determined to be above or below the average, with all other forces being broadly in line.

In practice this means that, very approximately, a third of forces are above, a third are below, and the remaining third are in line with the average for each measure. For this reason, the distance from the average required to make a

force's value above or below the average is different for each measure so may not appear to be consistent.

- Statistical significance – When commenting on statistical differences, we use a significance level of 5 percent.

Annex C – The Best Use of Stop and Search scheme

The scheme includes a number of features with the aim of achieving greater transparency, community involvement in the use of stop and search powers and supporting a more intelligence-led approach, leading to better outcomes.

Recording and publishing outcomes

The Best Use of Stop and Search scheme requires forces to record and publish the following outcomes from the use of stop and search powers:

- Arrest;
- Summons/charged by post;
- Caution (simple or conditional);
- Khat or cannabis warning;
- Penalty notice for disorder;
- Community resolution; and
- No further action.

Forces adopting the scheme should therefore be providing the public with a much richer picture of how their use of stop and search powers are enabling them to reduce crime rates. The scheme also requires forces to show the link, or lack of one, between the object of the search (what the officer was looking for) and the outcome. This link helps to show how accurate officers' reasonable grounds for suspicion are by showing the rate at which they find what they were searching for during the stop and search.

Providing opportunities for the public to observe stop and search encounters

A core element of the scheme is the requirement that participating forces will provide opportunities for members of the public to accompany police officers on patrol when they might use stop and search powers.

It is important for the public, particularly young people and people from black, Asian and minority ethnic communities, to be able to see the police conducting their work in a professional way. Equally, it is also important for the police to understand the communities they serve – as this enables more effective policing through community co-operation and exemplifies 'policing by consent'.

By introducing 'lay observation', a process of two-way learning can take place, bringing the police closer to the public.

Implementing a community trigger for complaints

The scheme requires forces to implement a community complaints trigger to signpost the appropriate mechanism for members of the community to raise any concerns or complaints that they have with the way that a stop and search has been carried out by their police force. When the trigger is activated, the scheme requires forces to explain the use of the powers to community scrutiny groups.

Authorising searches under section 60 Criminal Justice and Public Order Act 1994

Section 60 stop and search powers are among the most controversial of all such powers by virtue of the fact that individual police officers can stop and search a person without the need to have reasonable grounds for suspicion.

Once a section 60 authorisation is in place, officers do not need to have suspicions about a particular individual prior to stopping them; though an officer must explain to an individual who has been stopped that a section 60 authorisation is in place. This can lead to a large number of searches which result in community and police tensions. The scheme introduces a set of requirements that, when combined, will ensure that participating forces improve their use of this type of stop and search power. These include raising the authorisation level from inspector to senior officer (assistant chief constable or above), restricting the time a section 60 authorisation can be in force to 15 hours and communicating the purpose and outcomes of each section 60 authorisation in advance (where possible) and afterwards.

Monitoring the use of stop and search powers

The scheme requires forces to monitor the use of stop and search powers, in particular to determine their impact on black, Asian and minority ethnic people and young people.

Annex D – Types of use of Taser

Type of use Definition²⁷

Fired	The Taser is fired with a live cartridge installed. When the trigger is pulled, the probes are fired towards the subject with the intention of completing an electrical circuit and delivering an incapacitating effect.
Angled drive-stun	The officer fires the weapon with a live cartridge installed. One or both probes may attach to the subject. The officer then holds the Taser against the subject's body in a different area to the probe(s), in order to complete the electrical circuit and deliver an incapacitating effect.
Drive-stun	The Taser is held against the subject's body without a live cartridge installed, and the trigger is pulled with no probes being fired. Contact with the subject completes the electrical circuit which causes pain but does not deliver an incapacitating effect.
Red dot	The weapon is not fired. Instead, the Taser is deliberately aimed and then partially activated so that a laser red dot is placed onto the subject.
Arcing	Sparking of the Taser as a visible deterrent without aiming it or firing it.
Aimed	Deliberate aiming of the Taser at a targeted subject.
Drawn	Drawing of Taser in circumstances where any person could reasonably perceive the action as a use of force.

Tasers that have been 'discharged' are those that have been fired, angled drive-stunned or drive-stunned.

²⁷ *Police use of Taser statistics, England and Wales: 1 January to 31 December 2014*, Home Office, 2015. Available from www.gov.uk/government/statistics/police-use-of-taser-statistics-england-and-wales-1-january-to-31-december-2014.